

1 Nancy E. Hudgins, SBN 85222
2 Matthew M. Grigg, SBN 195951
3 LAW OFFICES OF NANCY E. HUDGINS
4 1981 N. Broadway, Ste. 210
5 Walnut Creek, CA 94596
6 925-906-0100
7 mmg@hudginslaw.com

8 Attorneys for Defendants Joe Dobie, Philip Earley,
9 Gary Loredo and Brad Smith

10 **UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA**

11 MARKEE CARTER,) Case No.: 13-cv-04373-EMC
12 Plaintiff,)
13 v.) **DEFENDANT'S ADMINISTRATIVE**
14 BRAD SMITH, et al.,) **MOTION TO FILE UNDER SEAL**
15 Defendants.)
16 AND RELATED ACTIONS:)
17 • *Spells v. Smith, et al.*, No. 13-4102-EMC)
18 • *Hirscher v. Smith, et al.*, No 14-0340-EMC)
19 • *Beyett v. Smith, et al.*, No. 14-3153-EMC)
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20 Defendants Dobie, Earley, Loredo, and Smith pursuant to Northern District Local
21 Rule 7-11 and 79-5, respectfully request permission to file under seal Paragraph 2 of the
22 order portion of the stipulation attached to the accompanying Grigg Declaration as Exh. A.
23 Good cause exists to permit filing of said paragraph under seal because:

24 1. it reflects confidential settlement terms,
25 2. sealing promotes settlements in general by allowing parties to enter into confidential
26 settlements,
27 3. the transcript of the settlement proceedings reflecting these settlement terms
28 previously was placed under seal by Magistrate Judge Spero (see Doc. 68-8), and

4. sealing this paragraph is necessary to file the stipulation and proposed order which, in turn, appears necessary to finalize the settlement of the four lawsuits at issue. Grigg Decl., ¶2.

Respectfully submitted:

Dated: March 18, 2016

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LAW OFFICES OF NANCY E. HUDGINS

1/21 Matthew M. Griff

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Attorney for Defendants Joe Dobie, Philip Earley,
Gary Loredo, and Brad Smith